

United States District Court

Southern

DISTRICT OF

New York

PAUL ARIAS (AND WIFE LISA-ANN ARIAS)

SUMMONS IN A CIVIL CASE

V.

CASE NUMBER:

1 WORLD TRADE CENTER LLC,
ET AL SEE ATTACHED RIDER,

06 CV 0066

Judge Hellerstein

TO: (Name and address of defendant)

See attached rider

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

WORBY GRONER FIDELMAN & NAPOLI BERN LLP
115 Broadway, 12th Floor
New York, New York 10006
212-267-3730

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

J. MICHAEL McMAHON

CLERK

DATE

Manos Quintero

(BY) DEPUTY CLERK

Service of the Summons and Complaint was made by me	DATE
NAME OF SERVER (PRINT)	TITLE

Check one box below to indicate appropriate method of service

☐ Served personally upon the defendant. Place where served: _____

☐ Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person with whom the summons and complaint were left: _____

☐ Returned Unexecuted: _____

☐ Other (specify): _____

STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL
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DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____

Date

Signature of Server

Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure

Plaintiffs,

- against -

1 WORLD TRADE CENTER LLC; 1 WTC HOLDINGS LLC; 2 WORLD TRADE CENTER LLC; 2 WTC HOLDINGS LLC; 4 WORLD TRADE CENTER LLC; 4 WTC HOLDING LLC; 5 WORLD TRADE CENTER LLC; 5 WTC HOLDING LLC; A RUSSO WRECKING, INC.; ABM; ABM INDUSTRIES, INC.; ABM JANITORIAL NORTHEAST, INC.; ACROW CORPORATION OF AMERICA; AMEC CONSTRUCTION MANAGEMENT, INC.; AMEC EARTH & ENVIRONMENTAL, INC.; ANTHONY CORTESE SPECIALIZED HAULING LLC; ASG PEST CONTROL; ATC ASSOCIATES, INC.; ATLANTIC HEYDT CORP.; ATLAS CONCRETE CORP.; BACOU-DALLOZ US HEADQUARTERS; BECHTEL CONSTRUCTION, INC.; BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL, INC.; BERGEN CONCRETE CUTTING, INC.; BERKEI & COMPANY, CONTRACTORS, INC.; BFP ONE LIBERTY PLAZA Co., L.P.; BFP TOWER C Co. LLC; BIG APPLE WRECKING & CONSTRUCTION CORP.; BOSTON PROPERTIES; BOVIS LEND LEASE LMB, INC.; BOVIS LEND LEASE, INC.; BREEZE CARTING CORP.; BREEZE NATIONAL INC.; BRER-FOUR TRANSPORTATION CORP.; BURO HAPPOLD CONSULTING ENGINEERS, P.C.; C & D FIREPROOFING & PLASTERING CORP.; C & D PAINTING & DECORATING, INC.; C.B. CONTRACTING CORP.; CANRON CONSTRUCTION CORP.; CANTOR SEINUK GROUP; CERTIFIED FENCE CORP.; CIVETTA- COUSINS JV, L.L.C.; CLEARCOR AIR FILTRATION PRODUCTS, INC.; COMPONENT ASSEMBLY SYSTEMS, INC.; CONSOLIDATED EDISON COMMUNICATIONS HOLDING COMPANY, INC.; CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.; CONSOLIDATED EDISON DEVELOPMENT, INC.; CONSOLIDATED EDISON ENERGY, INC.; CONSOLIDATED EDISON SOLUTIONS, INC.; CONSOLIDATED EDISON, INC.; COORDINATED METALS, INC.; CORD CONTRACTING CO., INC.; CRAIG TEST BORING COMPANY INC.; CRITICOM

TECH, INC.; DCM ERECTORS, INC.;
 DIAMOND POINT EXCAVATING CORP.;
 DIEGO CONSTRUCTION, INC.; DIVERSIFIED
 CARTING, INC.; DMT ENTERPRISE, INC.;
 EAGLE LEASING & INDUSTRIAL SUPPLY, INC.;
 EAGLE ONE ROOFING CONTRACTORS INC;
 EAGLE SCAFFOLDING CO., INC.; EJDAVIES,
 INC.; EN-TECH CORP.; ET ENVIRONMENTAL;
 EVERGREEN RECYCLING OF CORONA(EROC);
 EWELL W. FINLEY, P.C.; EXECUTIVE
 MEDICAL SERVICES, P.C.; F&G
 MECHANICAL, INC.; FELIX EQUITES, INC.;
 FLEET TRUCKING, INC.; FRANCIS A. LEE
 EXTERIOR RESTORATION, INC.; FRANK
 MICELLI JR. CONTRACTING, INC.; FTI
 TRUCKING, INC.; GILSANZ, MURRAY, & STEFICEK,
 LLP; GINO CRACOLICI & SONS INC.; GOLDSTEIN
 ASSOCIATES CONSULTING ENGINEERS, PLLC; GRACE
 INDUSTRIES, INC.; HALLEN WELDING SERVICE, INC.;
 HELMSMAN MANAGEMENT SERVICES, INC.; HCC
 CONTRACTING CORP.; HIGH-RISE ELECTRIC, INC.;
 HIGH RISE HOISTING AND SCAFFOLDING,
 INC.; HP ENVIRONMENTAL, INC.; JP
 EQUIPMENT RENTAL MATERIALS, INC; KOCH
 SKANSKA, INC.; LAQUILA CONSTRUCTION
 INC.; LASTRADA GENERAL CONTRACTING CORP.;
 LESLIE S. ROBERTSON ASSOCIATES CONSULTING
 ENGINEERS P.C.; LIBERTY MUTUAL
 INSURANCE COMPANY; LIBERTY MUTUAL
 MANAGED CARE INC.; LIRO, INC.; LOCKWOOD,
 KESSLER & BARTLETT, INC.; LUCIUS PETKIN, INC.;
 LZA TECH-DIV OF THORTON TOMASETTI;
 M.G. McLAREN, P.C.; MANAFORT BROTHERS
 INCORPORATED; MAZZOCCHI WRECKING, INC.; MENT
 PROS IRON WORKS CO., INC.; MERIDIAN
 CONSTRUCTION GROUP; MG McLAREN,
 P.C.; MOODY'S INVESTORS SERVICE; MORETRENCH
 AMERICAN CORPORATION; MRA ENGINEERING, PC;
 MUESER RUTLEDGE CONSULTING
 ENGINEERS, INC.; MUSCO SPORTS LIGHTING, LLC;
 NACIREMA INDUSTRIES INCORPORATED; NEW YORK
 CRANE & EQUIPMENT CORP.; NYC INDUSTRIAL
 DEVELOPMENT AGENCY; NICHOLSON
 CONSTRUCTION COMPANY; OFF ROAD WELDING,
 INC.; OLYMPIC PLUMBING & HEATING CORP.; OVE
 ARUP & PARTNERS P.C.; PARSON GROUP, INC.;
 PETER SCALAMANDRE & SONS, INC.; PINNACLE;
 PINNACLE ENVIRONMENTAL CORP.; PLAZA
 CONSTRUCTION CORP.; PLAZA
 CONSTRUCTION MANAGEMENT CORP.; PRO

ROBER SILMAN ASSOCIATES; ROBERT
 ERRAT; ROBERT L. GEROSA, INC.; RODAR
 ENTERPRISES, INC.; ROYAL GM, INC.; SAB
 TRUCKING INC.; SAFEWAY ENVIRONMENTAL CORP.;
 SEASONS INDUSTRIAL CONTRACTING; SEMCOR
 EQUIPMENT AND MANUFACTURING CORPORATION;
 SHELDRAKE ORGANIZATION, INC.; SILVERITE
 CONTRACTING CORPORATION; SILVERSTEIN
 DEVELOPMENT CORP.; SILVERSTEIN
 PROPERTIES INC.; SILVERSTEIN
 PROPERTIES; SILVERSTEIN WTC FACILITY
 MANAGER LLC; SILVERSTEIN WTC LLC;
 SILVERSTEIN WTC MGMT CO. LLC;
 SILVERSTEIN WTC PROPERTIES LLC;
 SIMPSON GUMPERTZ & HEGER INC.; SKIDMORE,
 OWING & MERRILL LLP; STAR DELTA ELECTRIC,
 INC.; STIER ANDERSON, LLC; SUMMIT
 STRUCTURES LLC; SURVIVAIR; TELENET
 COMMUNICATION INC.; THE CITY OF NEW
 YORK; TISHMAN CONSTRUCTION
 CORPORATION OF MANHATTAN; TISHMAN
 CONSTRUCTION CORPORATION OF NEW
 YORK; TISHMAN SPEYER PROPERTIES;
 TOMASETTI GROUP, INC.; TORRETTA
 TRUCKING, INC.; TOTAL SAFETY CONSULTING,
 LLC; TRIO ASBESTOS REMOVAL; TUCCI EQUIPMENT
 RENTAL CORP.; TULLY CONSTRUCTION CO.,
 INC.; TULLY CONSTRUCTION COMPANY;
 TULLY ENVIRONMENTAL INC.; TULLY
 INDUSTRIES, INC.; TURNER CONSTRUCTION
 CO.; TURNER CONSTRUCTION COMPANY;
 TURNER CONSTRUCTION INTERNATIONAL,
 LLC; TYSSSENKRUPP ELEVATOR CORPORATION;
 ULTIMATE DEMOLITION/CS HAULING
 (JOINT VENTURE); UNITED STATES REBAR, INC.;
 VERTICAL LEND INC.; VOLLMER ASSOCIATES LLP; W
 HARRIS & SONS INC.; WEEKS MARINE, INC.;
 WEIDLINGER ASSOCIATES, CONSULTING
 ENGINEERS, P.C.; WESTFIELD AMERICA,
 INC.; WESTFIELD WTC HOLDING LLC;
 WESTFIELD WTC, LLC; WFP Tower D. Co.,
 LP; WHITNEY CONTRACTING INC.; WOLKOW-BRAKER
 ROOFING CORP.; WORLD TRADE CENTER
 PROPERTIES LLC; YANNUZZI & SONS, INC.;
 YONKERS CONTRACTING COMPANY, INC.; YORK
 HUNTER CONSTRUCTION, LLC; ZIEGENFUSS DRILLING,
 INC.,

Defendants.

530 Fifth Avenue-18 Floor
New York, New York 10036

1 WTC HOLDINGS LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

120 BROADWAY HOLDING, LLC,
C/O SILVERSTEIN PROPERTIES
530 FIFTH AVENUE-18TH FLOOR
NEW YORK, NY 10036

2 WORLD TRADE CENTER LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

2 WTC HOLDINGS LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

4 WORLD TRADE CENTER LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

4 WTC HOLDINGS LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

5 WORLD TRADE CENTER LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

5 WTC HOLDINGS LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

A RUSSO WRECKING
69 East Avenue
Lawrence, NY 11559

ABM INDUSTRIES, INC.
170 HAMILTON AVENUE
WHITE PLAINS, NEW YORK 10601

ABM JANITORIAL NORTHEAST,
INC.
280 TRUMBULL STREET, 22 FLOOR
NEW YORK, HARTFORD, CT 06103

ACROW CORPORATION OF
AMERICA
396 Washington Avenue
Carlstadt, NJ 07072

AMEC CONSTRUCTION

CONTRACTORS INC.,
18-60 45TH STREET
ASTORIA, NY 11105

EAGLE SCAFFOLDING CO
67 Mill Street
Amityville, NY 11701

BJ DAVIES, INC.,
1837 Steinway Street
Astoria, NY 11105

EN-TECH CORP
C/O SACKS MONTGOMERY
Attn: Rick Rehn
800 Third Avenue
New York, NY 10022

ET ENVIRONMENTAL
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

EVERGREEN RECYCLING OF
CORONA
127-50 Northern Blvd
Flushing, NY 11368

EWELL W. FINLEY, P.C.,
34-18 Northern Boulevard
Long Island City, NY 11101

EXECUTIVE MEDICAL SERVICES,
P.C.,
15 Canal Road
Pelham Manor, NY 10803

F&G MECHANICAL, INC.,
348 New Country Road
Secaucus, NJ 07094

FELIX EQUITIES, INC.
C/O MATT VERULEN
202 Lovell Street
Lincolndale, NY 10540

FLEET TRUCKING, INC.
457 BLAKE AVENUE # 1
BROOKLYN, NY 11212

FRANCIS A. LEE COMPANY, A
CORPORATION
41 Bethpage Road
Hicksville, NY 11801

1 Kaissa Way Ste 301
Paramus, NJ 07652

REGIONAL SCAFFOLD & HOISTING
CO, INC.,
3900 Webster Avenue
Bronx, NY 10470

Rich-Mark Environmental Services Inc
365 Central Blvd.
Bayville, NJ 08721

ROBER SILMAN ASSOCIATES
88 University Place
New York, NY 10003

ROBERT L GERUSA, INC
122 West Sheffield Avenue
Englewood, NJ 07531

RODAR ENTERPRISES, INC.,
240 Van Wagner Road
Poughkeepsie, NY 12603

ROYAL GM INC.,
112 Clarke Avenue
Staten Island, NY 10306

SAB TRUCKING INC.
C/O SAVERIO ANASTASIO
7 Pisoni Court
Woodbury, NY 11797

SAFEWAY ENVIRONMENTAL CORP
1379 Commerce Avenue
Bronx, NY 10461

SEASONS INDUSTRIAL CONTRACTING,

SEASONS INDUSTRIAL
CONTRACTING,
266 GREEN VALLEY RD
STATEN ISLAND, NY 10312

SEMCOR EQUIPMENT AND
MANUFACTURING CORPORATION
18 Madison Street
Keyport, NJ 07735

SHELDRAKE ORGANIZATION, INC.
80 N. Franklin Street
Hempstead, NY 11550

AMEC EARTH &
ENVIRONMENTAL, INC.
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

ANTHONY CORTESE
SPECIALIZED HAULING, LLC
3 DOUGLAS ROAD
SPARTA, NJ 07871

ASG PEST CONTROL
67 MONTAUK HIGHWAY
COPTAGUE, NY 11726

ATC ASSOCIATES, INC.,
C/O ANTONETTE TYNES
329 Charterton Parkway
Hartsdale NY 10530

ATLANTIC HEYDT CORP
1281 METROPOLITAN AVE
BROOKLYN, NY 11237

ATLAS CONCRETE CORP
590 Belleville Turnpike
Kearny, NJ 07032

BACQU DALLOZ US
HEADQUARTERS
910 DOUGLAS PIKE
SMITHFIELD, RI 02917

BECHTEL CONSTRUCTION, INC.,
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

BECHTEL CORPORATION
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

BECHTEL ENVIRONMENTAL,
INC.,
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

BERGEN CONCRETE CUTTING,
INC
80 Railroad Avenue
Ridgepark, NJ 07660

STIRUCKING
14930 Powells Cove Boulevard
Whitestone, NY 11357

GILSANZ MURRAY STEFICEK,
LLP
129 West 27th Street 5th Flr
New York, NY 10001

GINO CRACOLICI & SONS, INC
220 Summit Drive
New Windsor, NY 12553

GOLDSTEIN ASSOCIATES
CONSULTING ENGINEERS, PLLC
31 West 27th Street
New York, NY 10001

GRACE INDUSTRIES, INC.
151-21 6th Road
Whitestone, NY 11357-1206

HALLEN WELDING SERVICE, INC.
45-24 37th Street
Long Island City, NY 11101

HELMSMAN MANAGEMENT
SERVICES, INC.
C/O CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

HGC CONTRACTING CORP
5201 Flushing Ave
Brooklyn, NY 11237

HIGH-RISE ELECTRIC, INC.,
55 W. 58th Street
New York, NY 10019

HIGH-RISE HOISTING AND
SCAFFOLDING, INC
2820 Berden Avenue
Long Island City, NY 11101

HP ENVIRONMENTAL
104 ELDEX STREET SUITE 11
BERNDON, VA 20170

JP EQUIPMENT RENTAL
MATERIALS, INC.
140 GRAND STREET, SUITE 501
WHITE PLAINS, NY 10601

KOCH SKANSKA, INC.,

SILVERSTEIN DEVELOPMENT
CORP.
529 Fifth Avenue
New York, NY 10017-4608

SILVERSTEIN PROPERTIES, INC.
530 Fifth Avenue-18 Floor
New York, New York 10036

SILVERSTEIN PROPERTIES
530 Fifth Avenue-18 Floor
New York, New York 10036

SILVERSTEIN WTC FACILITY
MANAGER LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

SILVERSTEIN WTC LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

SILVERSTEIN WTC MGMT CO LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

SILVERSTEIN WTC PROPERTIES
LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

SIMPSON GUMPERTZ & HIEGER INC
C/O NATIONAL REGISTERED
AGENTS, INC.,
875 Avenue of the Americas, Suite 501
New York, NY 10001

SKIDMORE OWINGS & MERRILL
LLP
14 Wall Street
New York, NY 10005-2101

STAR DELTA ELECTRIC
17 Battery Pl., Room 203
New York, NY 10004

STIER ANDERSON LLC
30 Vreeland Drive
Skillman NJ 08558

SUMMIT STRUCTURES LLC
946 N. Van Buren Street
Allentown, PA 18109

AGENTS, INC., 875 Avenue of the Americas, Suite 501 New York, NY 10001	LAQUILA CONSTRUCTION INC 1590 Troy Avenue Brooklyn, NY 11234	TELENET COMMUNICATIONS INC C/O PETER BENEMERITO 16 Shenandoah Avenue Staten Island, NY 10314
BEP ONE LIBERTY PLAZA CO., L.P., 29 TRACK SITE PLATTSBURGH, NY 12901	LASTRADA GENERAL CONTRACTING CORP 118-20 29 th Avenue College Point, NY 11354	THE CITY OF NEW YORK 100 Church Street New York, NY 10007
BEP TOWER C CO. LLC, C/O UNITED CORPORATE SERVICES, INC. 10 BANK STREET, SUITE 560 WHITE PLAINS, NY 10606	LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEER P.C. 170 Hamilton Avenue White Plains, NY 10601	TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN 666 Fifth Avenue New York, NY 10103
BIG APPLE WRECKING & CONSTRUCTION CORP 1379 Commerce Avenue Bronx, NY 10461	LIBERTY MUTUAL INSURANCE COMPANY 1818 MARKET STREET PHILADELPHIA, PA 19103	TISHMAN CONSTRUCTION CORPORATION OF NEW YORK 666 Fifth Avenue New York, NY 10103
BOVIS LEND LEASE LMB, INC. c/o Mound Cotton Wollan & Greengrass One Battery Park Plaza New York, NY 10004 Or- 200 Park Avenue New York, NY 10166	LIBERTY MUTUAL INSURANCE COMPANY 630 MORRISON ROAD SUITE 300 GAHANNA, OH 43230	TISEMAN SPEYER PROPERTIES, 666 5 TH AVENUE, 12 TH FLOOR NEW YORK, NY 10103
BOVIS LEND LEASE, INC. c/o Mound Cotton Wollan & Greengrass One Battery Park Plaza New York, NY 10004 Or 200 Park Avenue New York, NY 10166	LIBERTY MUTUAL INSURANCE COMPANY 3850 NORTH CAUSEWAY BOULEVARD SUITE 600 METAIRIE, LA 70002	TOMASETTI GROUP 641 Avenue of the Americas New York, NY 10011
BREEZE CARTING CORP 31 Bay Street Brooklyn, NY 11231	LIBERTY MUTUAL INSURANCE COMPANY 165 DARTMOUTH STREET BOSTON, MA 02116	TORRETTA TRUCKING, INC 120 MOUNTAINVIEW AVENUE STATEN ISLAND, NY 10314
BREEZE NATIONAL, INC., 31 Bay Street Brooklyn, NY 11231	LIBERTY MUTUAL MANAGED CARE, INC., C/O CT CORPORATION SYSTEM 111 Eighth Avenue New York, NY 10011	TOTAL SAFETY CONSULTING, L.L.C C/O THELLC 5 Court Square Long Island City, NY 11101
BRIER-FOUR TRANSPORTATION CORP. 33 Hewitt Street Hicksville, NY 11801	LIRO GROUP, INC. 444 Beach 54th Street Arverne, NY 11692	TUCCI EQUIPMENT RENTAL CORP 3495 Roubours Avenue Bronx, NY 10475
BURO HAPPOLD CONSULTING ENGINEERS, P.C., 105 Chambers Street New York, NY 10007	LOCKWOOD KESSLER & BARTLETT, INC. One Aerial Way Syosset, New York 11791	TULLY CONSTRUCTION CO., INC. 127-50 Northern Blvd Flushing, NY 11368 Or- c/o Mound Cotton Wollan & Greengrass One Battery Park Plaza New York, NY 10004
	LUCIUS PITKIN, INC 50 Hudson Street New York, NY 10013-3389	TULLY CONSTRUCTION COMPANY 127-50 Northern Blvd Flushing, NY 11368

48 Walnut Street
New Rochelle NY 10801

C & D PAINTING &
DECORATING, INC.
15 Wirt Avenue
Staten Island NY 10309

C.B. CONTRACTING CORP
4118 Victory Blvd
Staten Island, NY 10314

CANON CONSTRUCTION CORP
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

CANTOR SEINUK GROUP
228 East 45th Street
New York, NY 10017

CERTIFIED FENCE CORP.
59 Grant Street
Harrison New York 10528

CIVETTA-COUSINS JV, L.L.C
1100 East 156th Street
Bronx, NY 10474

CLARCOR AIR FILTRATION
PRODUCTS, INC.
C/O CT Corporation System
111 EIGHTH AVENUE
NEW YORK, NY 10011

COMPONENT ASSEMBLY
SYSTEMS, INC.,
520 Fifth Avenue
Pelham NY 10823

CONSOLIDATED EDISON
COMMUNICATIONS HOLDING
COMPANY, INC.,
4 Irving Place
New York, New York 10003

CONSOLIDATED EDISON
COMPANY OF NEW YORK, INC.,
4 Irving Place
New York, New York 10003

CONSOLIDATED EDISON
DEVELOPMENT, INC.,
4 Irving Place
New York, New York 10003

M.G. MCLAREN, P.C.,
100 Snake Hill Road
West Nyack, NY 10994-0600

MANAFORT BROTHERS, INC.
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

MAZZOCCHI WRECKING, INC.
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

MENT BROS. IRON WORKS CO.,
INC.,
150 West 22nd Street
New York, NY 10011

MERIDIAN CONSTRUCTION
CORP.
29 Grasmere Court
Staten Island, NY 10305

MG MCLAREN, P.C
100 Snake Hill Road
West Nyack, NY 10994

MOODY'S INVESTORS SERVICE,
C/O CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY 10011

MORETRENCH AMERICAN
CORPORATION
C/O UNITED STATES
CORPORATION
80 State Street
Albany, NY 12207

MRA ENGINEERING P.C.,
600 Hempstead Turnpike
West Hempstead, NY 11552-1036

MUESER RUTLEDGE
CONSULTING ENGINEERS
225 West 34th Street
New York, NY 10122

MUSCO SPORTS LIGHTING, LLC
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

TULLY ENVIRONMENTAL INC.
127-50 Northern Blvd
Flushing, NY 11368

TULLY INDUSTRIES, INC.,
127-50 Northern Blvd
Flushing, NY 11368
Or-
c/o Mound Cotton Wallan & Greengrass
One Battery Park Plaza
New York, NY 10004

TURNER CONSTRUCTION CO.
375 Hudson Street
New York, NY 10014

TURNER CONSTRUCTION
COMPANY
375 Hudson Street
New York, NY 10014

TURNER CONSTRUCTION
INTERNATIONAL, LLC.
375 Hudson Street
New York, NY 10014

TYYSSENKRUPP ELEVATOR
CORPORATION
C/O THE PRENTICE-HALL
CORPORATION SYSTEM
80 State Street
Albany, NY 12207-2544

ULTIMATE DEMOLITIONS/CS
HAULING
500 New Street
Oceanside, NY 11572

UNITED STATES REBAR, INC.,
332 N. Main Street
Freeport, NY 11520

Vertical Technology
365 Charles Street
Providence, RI 02904

Vertical Lead Inc
3 Huntington Quadrangle
Suite 303N
Melville, NY 11747

VOLLMER ASSOCIATES LLP
50 West 23rd Street

4 Irving Place
New York, New York 10003

CONSOLIDATED EDISON
SOLUTIONS, INC.,
4 Irving Place
New York, New York 10003

CONSOLIDATED EDISON, INC.,
4 Irving Place
New York, New York 10003

CONSULTING ENGINEERS, P.C.

COORDINATED METALS, INC.,
626 16th Street
Carlstadt, NJ 07072

CORD CONTRACTING CO., INC
213 Roslyn Road
Roslyn Height, NY 11577

CRAIG TEST BORING COMPANY
INC.
PO Box 427
Mays Landing, NJ 08330

CRITICOM INTERNATIONAL
CORPORATION
99 Pine Street, 3rd Floor
Albany, NY 12207

CUSHMAN & WAKFIELD, INC,
C/O CORPORATION SYSTEM
111 EIGHTH AVENUE
NEW YORK, NY 10006

D'ONOFRIO GENERAL
CONTRACTORS CORP
202 28th Street
Brooklyn, NY 11232

DAKOTA DEMO-TECH
140 Old Northport Road
Kings Park, NY 11754

DCM ERECTORS, INC
110 E. 42nd Street, Ste 1710
New York, NY 10017

DIAMOND POINT EXCAVATING
CORP
c/o ELIZABETH L. CROZZOLI
134-32 57th Avenue
Flushing, NY 11355

211 West 3rd Street
Bayonne, NJ 07002

NEW YORK CRANE &
EQUIPMENT CORP.
Brooklyn Navy Yard
Brooklyn, NY 11205

NICHOLSON CONSTRUCTION
COMPANY
C/O CT CORPORATION SYSTEM
111 Eighth Avenue
New York, NY 10011

NYC INDUSTRIAL DEVELOPMENT
AGENCY
C/O SILVERSTEIN PROPERTIES
530 FIFTH AVENUE-18TH FLOOR
NEW YORK, NY 10036

OFF ROAD WELDING, INC.
417 LITTLE BROOK RD
GLEN GARDNER, NJ 08826

OLYMPIC PLUMBING & HEATING
CORP
COOPERMAN LEVITT &
WINIKOFF, P.C.
1129 Northern Boulevard
Manhasset, NY 11030

OVE ARUP & PARTNERS P.C.,
155 Avenue of the Americas
New York, NY 10013

PARSON GROUP
70 East 55th Street, 5th Floor
New York, NY 10022

PETER SCALAMANDRE & SONS,
INC.
157 Albany Avenue
Freeport, NY 11520

PINNACLE ENVIRONMENTAL
CORP
c/o Paul O'Brien
64-54 Maurice Avenue
Maspeth, NY 11378

PLAZA CONSTRUCTION CORP.
110 Palma Drive
New York, NY 10304

PLAZA CONSTRUCTION

37 West Washington Avenue
Pearl River, NY 10965

WEEKS MARINE, INC.
4 Commerce Drive
Cranford, NJ 07016

WEIDINGER ASSOCIATES,
CONSULTING ENGINEERS, P.C.,
375 Hudson Street, 12th Floor
New York, NY 10014

WESTFIELD AMERICA, INC.
11601 Wilshire Boulevard
Los Angeles, CA 90025

WESTFIELD WTC HOLDING LLC
C/O CT Corporation System
111 Eighth Avenue
New York, NY 10011

WESTFIELD WTC, LLC
C/O CT Corporation System
111 Eighth Avenue
New York, NY 10011

WFP TOWER D. CO., LP,
222 BROADWAY
NEW YORK, NY 10006

WHITNEY CONTRACTING INC.
636 Saw Mill River Road
Yonkers, NY 10701

WOLKOW-BRAKER ROOFING CORP
c/o WILLIAM ROTHBERG
18 Court Street, Suite 2200
Brooklyn, NY 11241

WORLD TRADE CENTER
PROPERTIES LLC
530 Fifth Avenue-18 Floor
New York, New York 10036

YANNUZZI & SONS INC
56 Oakwood Avenue
Orange, NJ 07050

YONKERS CONTRACTING
COMPANY, INC.,
969 Midland Avenue
Yonkers NY 10704

YORK HUNTER CONSTRUCTION,
LLC

SCHAFFEL MACHINERY & TOOL
MOORE, ESQS
1157 60th Street
Brooklyn, NY 11209

PRO SAFETY SERVICES, LLC
c/o John Raucchi
2500 Westchester Avenue
Purchase, NY 10577

ZIGZAG DRILLING, INC.,
C/O CT CORPORATION SYSTEMS
111 Eighth Avenue
New York, NY 10011

DIVERSIFIED CARTING, INC
28 Garfield Avenue
Bayshore, NY 11706

DMT ENTERPRISE, INC.
255 Lake Avenue
Yonkers, NY 10701

EAGLE LEASING & INDUSTRIAL
SUPPLY
1726 FLATBUSH AVENUE
BROOKLYN, NY 11210

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
DISASTER SITE LITIGATION

PAUL ARIAS AND LISA-ANN ARIAS

Plaintiffs,

- against -

1 WORLD TRADE CENTER LLC; 1 WTC
HOLDINGS LLC; 2 WORLD TRADE CENTER LLC;
2 WTC HOLDINGS LLC; 4 WORLD TRADE
CENTER LLC; 4 WTC HOLDING LLC; 5 WORLD
TRADE CENTER LLC; 5 WTC HOLDING LLC; A
RUSSO WRECKING, INC.; ABM; ABM INDUSTRIES,
INC.; ABM JANITORIAL NORTHEAST, INC.;
ACROW CORPORATION OF AMERICA; AMEC
CONSTRUCTION MANAGEMENT, INC.; AMEC
EARTH & ENVIRONMENTAL, INC.; ANTHONY
CORTESE SPECIALIZED HAULING LLC; ASG PEST
CONTROL; ATC ASSOCIATES, INC.; ATLANTIC HEYDT
CORP.; ATLAS CONCRETE CORP.; BACOU-
DALLOZ US HEADQUARTERS; BECHTEL
CONSTRUCTION, INC.; BECHTEL
CORPORATION; BECHTEL ENVIRONMENTAL,
INC.; BERGEN CONCRETE CUTTING, INC.; BERKEL &
COMPANY, CONTRACTORS, INC.; BFP ONE
LIBERTY PLAZA Co., L.P.; BFP TOWER C Co. LLC; BIG
APPLE WRECKING & CONSTRUCTION CORP.;
BOSTON PROPERTIES; BOVIS LEND LEASE LMB,
INC.; BOVIS LEND LEASE, INC.; BREEZE
CARTING CORP.; BREEZE NATIONAL INC.;
BRER-FOUR TRANSPORTATION CORP.; BURO
HAPPOLD CONSULTING ENGINEERS, P.C.; C & D
FIREPROOFING & PLASTERING CORP.; C & D
PAINTING & DECORATING, INC.; C.B.
CONTRACTING CORP.; CANRON CONSTRUCTION
CORP.; CANTOR SEINUK GROUP; CERTIFIED FENCE
CORP.; CIVETTA-COUSINS JV, L.L.C.; CLARCOR
AIR FILTRATION PRODUCTS, INC.; COMPONENT

21 MC 100 (AKH)

DOCKET NO.

06 01 0066
CHECK-OFF ("SHORT FORM")
COMPLAINT
RELATED TO THE
MASTER COMPLAINT

PLAINTIFF(S) DEMAND A TRIAL BY
JURY

ASSEMBLY SYSTEMS, INC.; CONSOLIDATED
 EDISON COMMUNICATIONS HOLDING
 COMPANY, INC.; CONSOLIDATED EDISON
 COMPANY OF NEW YORK, INC.;
 CONSOLIDATED EDISON DEVELOPMENT, INC.;
 CONSOLIDATED EDISON ENERGY, INC.;
 CONSOLIDATED EDISON SOLUTIONS, INC.;
 CONSOLIDATED EDISON, INC.; COORDINATED
 METALS, INC.; CORD CONTRACTING CO., INC.;
 CRAIG TEST BORING COMPANY INC.; CRITICOM
 INTERNATIONAL CORPORATION; CUSEMAN &
 WAKEFIELD, INC; D'ONOFRIO GENERAL
 CONTRACTORS CORP.; DAKOTA DEMO-TECH,
 INC.; DCM ERECTORS, INC.; DIAMOND POINT
 EXCAVATING CORP.; DIEGO CONSTRUCTION,
 INC.; DIVERSIFIED CARTING, INC.; DMT
 ENTERPRISE, INC.; EAGLE LEASING & INDUSTRIAL
 SUPPLY, INC.; EAGLE ONE ROOFING
 CONTRACTORS INC; EAGLE SCAFFOLDING CO.,
 INC.; E DAVIES, INC.; EN-TECH CORP.; ET
 ENVIRONMENTAL; EVERGREEN RECYCLING OF
 CORONA(EROC), EWELL W. FINLEY, P.C.;
 EXECUTIVE MEDICAL SERVICES, P.C.; F&G
 MECHANICAL, INC.; FELIX EQUITIES, INC.;
 FLEET TRUCKING, INC.; FRANCIS A. LEE
 EXTERIOR RESTORATION, INC.; FRANK
 MICELLI JR CONTRACTING, INC.; FTI
 TRUCKING, INC.; GILSANZ, MURRAY, & STEFCEK,
 LLP; GINO CRACOLICI & SONS INC.; GOLDSTEIN
 ASSOCIATES CONSULTING ENGINEERS, PLLC.; GRACE
 INDUSTRIES, INC.; HALLEN WELDING SERVICE, INC.;
 HELMSMAN MANAGEMENT SERVICES, INC.; HCC
 CONTRACTING CORP.; HIGH-RISE ELECTRIC, INC.; HIGH
 RISE HOISTING AND SCAFFOLDING, INC.; HP
 ENVIRONMENTAL, INC.; JP EQUIPMENT
 RENTAL MATERIALS, INC.; KOCH SKANSKA, INC.;
 LAQUILA CONSTRUCTION INC.; LASTRADA
 GENERAL CONTRACTING CORP.; LESLIE E. ROBERTSON
 ASSOCIATES CONSULTING ENGINEERS P.C.; LIBERTY
 MUTUAL INSURANCE COMPANY; LIBERTY
 MUTUAL MANAGED CARE INC.; LIRO, INC.;
 LOCKWOOD, KESSLER & BARTLETT, INC.; LUCIUS PITKIN,
 INC.; LZA TECH-DIV OF THORTON TOMASETTI;
 M.G. McLAREN, P.C.; MANAFORT BROTHERS
 INCORPORATED; MAZZUCCHI WRECKING, INC.; MENT
 BROS. IRON WORKS CO., INC.; MERIDIAN
 CONSTRUCTION GROUP; MC McLAREN, P.C.;
 MOODY'S INVESTORS SERVICE; MORETRENCH AMERICAN

CORPORATION; MRA ENGINEERING, PC; MUESER
 RUTLEDGE CONSULTING ENGINEERS, INC;
 MUSCO SPORTS LIGHTING, LLC.; NACIREMA INDUSTRIES
 INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP.;
 NYC INDUSTRIAL DEVELOPMENT AGENCY; NICHOLSON
 CONSTRUCTION COMPANY; OFF ROAD WELDING,
 INC.; OLYMPIC PLUMBING & HEATING CORP.; OVE ARUP
 & PARTNERS P.C.; PARSON GROUP, INC.; PETER
 SCALAMANDRE & SONS, INC.; PINNACLE; PINNACLE
 ENVIRONMENTAL CORP.; PLAZA CONSTRUCTION
 CORP.; PLAZA CONSTRUCTION MANAGEMENT
 CORP.; PRO SAFETY SERVICES LLC.; PT & L
 CONTRACTING CORP.; REGIONAL SCAFFOLDING &
 HOISTING CO., INC.; RICH-MARK ENVIRONMENTAL
 SERVICES INC; ROBER SILMAN ASSOCIATES;
 ROBERT ERRAT; ROBERT L. GEROSA, INC.;
 RODAR ENTERPRISES, INC.; ROYAL GM, INC; SAB
 TRUCKING INC.; SAFEWAY ENVIRONMENTAL CORP.;
 SEASONS INDUSTRIAL CONTRACTING; SEMCOR
 EQUIPMENT AND MANUFACTURING CORPORATION;
 SHELDRAKE ORGANIZATION, INC.; SILVERITE
 CONTRACTING CORPORATION; SILVERSTEIN
 DEVELOPMENT CORP; SILVERSTEIN
 PROPERTIES INC; SILVERSTEIN PROPERTIES;
 SILVERSTEIN WTC FACILITY MANAGER LLC.;
 SILVERSTEIN WTC LLC; SILVERSTEIN WTC
 MGMT CO. LLC.; SILVERSTEIN WTC
 PROPERTIES LLC.; SIMPSON GUMPERTZ & HEGGER INC.;
 SKIDMORE, OWING & MERRILL LLP; STAR DELTA
 ELECTRIC, INC.; STIER ANDERSON, LLC.; SUMMIT
 STRUCTURES LLC.; SURVIVAIR; Telenet
 COMMUNICATION INC.; THE CITY OF NEW YORK;
 TISHMAN CONSTRUCTION CORPORATION OF
 MANHATTAN; TISHMAN CONSTRUCTION
 CORPORATION OF NEW YORK; TISHMAN SPEYER
 PROPERTIES; TOMASETTI GROUP, INC.;
 TORRETTA TRUCKING, INC.; TOTAL SAFETY
 CONSULTING, LLC.; TRIO ASBESTOS REMOVAL; TUCCI
 EQUIPMENT RENTAL CORP.; TULLY CONSTRUCTION
 CO., INC.; TULLY CONSTRUCTION COMPANY;
 TULLY ENVIRONMENTAL INC.; TULLY
 INDUSTRIES, INC.; TURNER CONSTRUCTION
 CO.; TURNER CONSTRUCTION COMPANY;
 TURNER CONSTRUCTION INTERNATIONAL,
 LLC.; TYSSSENKRUPP ELEVATOR CORPORATION;
 ULTIMATE DEMOLITION/CS HAULING (JOINT
 VENTURE); UNITED STATES REBAR, INC.; VERTICAL
 LEND INC.; VOLLMER ASSOCIATES LLP; W HARRIS &

SONS INC.; WEEKS MARINE, INC.; WEIDLINGER
ASSOCIATES, CONSULTING ENGINEERS, P.C.;
WESTFIELD AMERICA, INC; WESTFIELD WTC
HOLDING LLC; WESTFIELD WTC, LLC.; WFP
TOWER D. Co., LP; WHITNEY CONTRACTING INC.;
WOLKOW-BRAKER ROOFING CORP.; WORLD TRADE
CENTER PROPERTIES LLC.; YANNUZZI & SONS,
INC; YONKERS CONTRACTING COMPANY, INC.; YORK
HUNTER CONSTRUCTION, LLC; ZIEGENFUSS DRILLING,
INC.,

Defendants.

By Order of the Honorable Alvin K. Hellerstein, United States District Judge, dated May 12, 2005, ("the Order"), a Master Complaint for all Plaintiffs was filed on May 12, 2005.

NOTICE OF ADOPTION

All headings and paragraphs in the Master Complaint are applicable to and are adopted by the instant Plaintiff(s) as if fully set forth herein in addition to those paragraphs specific to the individual Plaintiff(s), which are listed below. These are marked with an "☑" if applicable to the instant Plaintiff(s), and specific case information is set forth, as needed, below.

Plaintiffs, PAUL ARIAS AND LISA-ANN ARIAS, by his/her/their attorneys WORBY GRONER EDELMAN & NAPOLI BERN, LLP, complaining of Defendant(s), respectfully allege:

I. PARTIES

A. PLAINTIFF(S)

1. ☑ Plaintiff, PAUL ARIAS (hereinafter the "Injured Plaintiff"), is an individual and a citizen of the State of New York residing at 1724- 76th Street, Brooklyn, NY 11214 .

(OR)

2. Alternatively,

A. ☐ Plaintiff, PAUL ARIAS (hereinafter the "Injured Plaintiff"), is an individual and a citizen of _____ residing at _____.

B. ☐ _____ is the _____ of Decedent _____ and brings this claim in his (her) capacity as Administratrix/or of the Estate of _____.

*Please read this document carefully.
It is very important that you fill out each and every section of this document.*

3. ☒ Plaintiff, Lisa-Ann Arias (hereinafter the "Derivative Plaintiff"), is a citizen of New York residing at 1724 76th Street, Brooklyn, NY 11214-, and has the following relationship to the Injured Plaintiff:

☒ SPOUSE at all relevant times herein, is and has been lawfully married to Plaintiff PAUL ARIAS, and brings this derivative action for her (his) loss due to the injuries sustained by her husband (his wife), Plaintiff PAUL ARIAS.

☐ Parent

☐ Child

☐ Other: _____

4. In the period from 9/11/2001 to 3/15/2002 the Injured Plaintiff worked for Fire Department New York (FDNY) as a Fire Fighter at:

Please be as specific as possible when filling in the following dates and locations

i. ☒ The World Trade Center Site

1. Location(s) (i.e., building, quadrant, etc.) _____
2. From on or about 9/11/2001 until 3/15/2002;
3. Approximately 12 hours per day; for
4. Approximately 60 days total.

ii. ☐ The New York City Medical Examiner's Office

1. From on or about _____ until _____;
2. Approximately _____ hours per day; for
3. Approximately _____ days total.

iii. ☐ The Fresh Kills Landfill

1. From on or about _____ until _____;

Please read this document carefully.

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2. Approximately _____ hours per day; for
3. Approximately _____ days total.

iv. The Barge

1. From on or about _____ until _____ ;
2. Approximately _____ hours per day; for
3. Approximately _____ days total.

- v. Other:* For injured plaintiffs who worked at Non-WTC Site building or location. The injured plaintiff worked at the address/location, for the dates alleged, for the hours per day, for the total days, and for the employer, as specified below:

1. From on or about _____ until _____ ;
2. Approximately _____ hours per day; for
3. Approximately _____ days total;
4. Name and Address of Non-WTC Site Building/Worksite:

**Continue this information on a separate sheet of paper if necessary.*

If more space is needed to specify "Other" locations, please annex a separate sheet of paper with the information.

5. Injured Plaintiff

- ☒ Was exposed to and breathed noxious fumes on all dates, at the site(s) indicated above;
- ☒ Was exposed to and inhaled or ingested toxic substances and particulates on all dates at the site(s) indicated above;
- ☒ Was exposed to and absorbed or touched toxic or caustic substances on all dates at the site(s) indicated above;
- ☒ Other: Not yet determined. _____

6. Injured Plaintiff

Please read this document carefully.

It is very important that you fill out each and every section of this document.

- ☒ Has not made a claim to the Victim Compensation Fund. Pursuant to §405(e)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, the issue of waiver is inapplicable.
- ☐ Made a claim to the Victim Compensation Fund that was denied. Pursuant to § 405(e)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, the issue of waiver is inapplicable.
- ☐ Made a claim to the Victim Compensation Fund, that was subsequently withdrawn by Ground-Zero Plaintiff. Pursuant to § 405(e)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, the issue of waiver is inapplicable.
- ☐ Made a claim to the Victim Compensation Fund that was granted. Pursuant to § 405(e)(3)(B)(i) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, Ground Zero-Plaintiff has waived her/his right(s) to pursue any further legal action for the injuries identified in said claim.

B. DEFENDANT(S)

The following is a list of all Defendant(s) named in the Master Complaint. If checked, all paragraphs pertaining to that Defendant are deemed pleaded herein.

- ☒ THE CITY OF NEW YORK
- ☐ A Notice of Claim was timely filed and served on _____ and _____ pursuant to General Municipal Law §50-h the CITY _____ (OR)
- ☐ The City has yet to hold a hearing as required by General Municipal Law §50-h
- ☐ More than thirty days have past and the City has not adjusted the claim.
- (AND/OR)
- ☒ An Order to Show Cause application to _____
- ☒ deem Plaintiff's (Plaintiffs') Notice of Claim timely filed, or in the alternative to grant Plaintiff(s) leave to file a late Notice of Claim *Nunc Pro*

Please read this document carefully.

It is very important that you fill out each and every section of this document.

Tunc (for leave to file a late Notice of Claim *Nunc Pro Tunc*) has been filed and a determination

☐ is pending

☒ Granting petition was made on 11/25/05

☐ Denying petition was made on:

☐ PORT AUTHORITY OF NEW YORK AND NEW JERSEY ["PORT AUTHORITY"]

☐ A Notice of Claim was filed and served pursuant to Chapter 179, §7 of The Unconsolidated Laws of the State of New York on

☐ More than sixty days have elapsed since the Notice of Claim was filed, (and)

☐ the PORT AUTHORITY has adjusted this claim

☐ the PORT AUTHORITY has not adjusted this claim.

☒ 1 WORLD TRADE CENTER, LLC

☒ 1 WTC HOLDINGS, LLC

☒ 2 WORLD TRADE CENTER, LLC

☒ 2 WTC HOLDINGS, LLC

☒ 4 WORLD TRADE CENTER, LLC

☒ 4 WTC HOLDINGS, LLC

☒ 5 WORLD TRADE CENTER, LLC

☒ 5 WTC HOLDINGS, LLC

☒ AMEC CONSTRUCTION MANAGEMENT, INC.

☒ BECHTEL ASSOCIATES PROFESSIONAL CORPORATION

☒ BECHTEL CONSTRUCTION, INC.

☒ BECHTEL CORPORATION

☒ BECHTEL ENVIRONMENTAL, INC.

☒ BOVIS HOLDINGS LIMITED

☒ BOVIS INTERNATIONAL, INC.

☒ BOVIS LEND LEASE, INC.

Please read this document carefully.

It is very important that you fill out each and every section of this document.

- ☒ BOVIS LEND LEASE INTERIORS, INC.
- ☒ BOVIS LEND LEASE LMB, INC.
- ☒ CONSOLIDATED EDISON COMMUNICATIONS HOLDING COMPANY, INC
- ☒ CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
- ☒ CONSOLIDATED EDISON DEVELOPMENT, INC.
- ☒ CONSOLIDATED EDISON ENERGY, INC.
- ☒ CONSOLIDATED EDISON, INC.
- ☒ CONSOLIDATED EDISON SOLUTIONS, INC.
- ☒ LIBERTY MUTUAL MANAGED CARE, INC.
- ☒ PLAZA CONSTRUCTION CORP.
- ☒ PLAZA CONSTRUCTION MANAGEMENT CORP.
- ☒ SILVERSTEIN PROPERTIES
- ☒ SILVERSTEIN PROPERTIES, INC.
- ☒ SILVERSTEIN WTC FACILITY MANAGER, LLC
- ☒ SILVERSTEIN WTC, LLC
- ☒ SILVERSTEIN WTC MANAGEMENT CO., LLC
- ☒ SILVERSTEIN WTC PROPERTIES, LLC
- ☒ TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN
- ☒ TISHMAN CONSTRUCTION CORPORATION OF NEW YORK
- ☒ TULLY CONSTRUCTION CO., INC.
- ☒ TULLY CONSTRUCTION COMPANY
- ☒ TULLY ENVIRONMENTAL INC.
- ☒ TULLY INDUSTRIES, INC.
- ☒ TURNER CONSTRUCTION CO.
- ☒ TURNER CONSTRUCTION COMPANY
- ☒ TURNER CONSTRUCTION INTERNATIONAL, LLC
- ☒ TURNER/PLAZA, A JOINT VENTURE
- ☒ WESTFIELD AMERICA, INC.
- ☒ WESTFIELD WTC, LLC, NOW KNOWN AS WTC RETAIL, LLC
- ☒ WESTFIELD WTC HOLDING, LLC
- ☒ WORLD TRADE CENTER PROPERTIES, LLC

Please read this document carefully.

It is very important that you fill out each and every section of this document.

☒ OTHER: SEE ADDENDUM A

☐ Non-WTC Site Building Owner

Name: _____

Business/Service Address: _____

Building/Worksite Address: _____

☐ Non-WTC Site Lessee

Name: _____

Business/Service Address: _____

Building/Worksite Address: _____

☐ Non-WTC Site Building Managing Agent

Name: _____

Business/Service Address: _____

Building/Worksite Address: _____

II. JURISDICTION

The Court's jurisdiction over the subject matter of this action is:

☐ Founded upon Federal Question Jurisdiction; specifically

☐ Air Transport Safety & System Stabilization Act of 2001, (or)

☐ Federal Officers Jurisdiction, (or)

☐ Other (specify): _____

☒ Contested, but the Court has already determined that it has removal jurisdiction over this action, pursuant to 28 U.S.C. § 1441.

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III. CAUSES OF ACTION

Plaintiff(s) seeks damages against the above named defendants based upon the following theories of liability, and asserts each element necessary to establish such a claim under the applicable substantive law:

- ☒ Breach of the defendants' duties and obligations pursuant to the New York State Labor Law(s) including §§ 200 and 240
- ☒ Breach of the defendants' duties and obligations pursuant to the New York State Labor Law 241(6)
- ☒ Pursuant to New York General Municipal Law §205-a
- ☒ Pursuant to New York General Municipal Law §205-c
- ☒ Common Law Negligence
- ☒ Medical Monitoring
- ☒ Fear of Cancer
- ☒ Fraud and Misrepresentation:
 - ☒ Air Quality;
 - ☒ Effectiveness of Mask Provided;
 - ☐ Effectiveness of Other Safety Equipment Provided (specify: _____);
 - ☒ Other(specify): Not yet determined.
- ☐ Wrongful Death
- ☒ Loss of Services/Loss of Consortium for Derivative Plaintiff
- ☐ Other: _____

Please read this document carefully.

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IV. CAUSATION, INJURY AND DAMAGE

1. As a direct and proximate result of defendant's culpable actions in the rescue and/or recovery and/or construction, renovation, alteration, demolition and all work performed at the premises, the Injured Plaintiff sustained (including, but not limited to) the following injuries:

☐ Abdominal Pain
Date of onset: _____
Date physician first connected this injury to WTC work: _____

☐ Asthma
Date of onset: _____
Date physician first connected this injury to WTC work: _____

☐ Brain Tumor
Date of onset: _____
Date physician first connected this injury to WTC work: _____

☐ Burns
Location of burn (body part/percent): _____
Date of onset: _____
Date physician first connected this injury to WTC work: _____

☐ Chronic Bronchitis
Date of onset: _____
Date physician first connected this injury to WTC work: _____

☐ Chronic Cough
Date of onset: _____
Date physician first connected this injury to WTC work: _____

☒ Chronic Obstructive Lung Disease
Date of onset: To be supplied at a later date
Date physician first connected this injury to WTC work: To be supplied at a later date

☐ Dermatitis
Date of onset: _____
Date physician first connected this injury to WTC work: _____

☒ Fear of Cancer
Date of onset: To be supplied at a later date
Date physician first connected this injury to WTC work: To be supplied at a later date

*Please read this document carefully.
It is very important that you fill out each and every section of this document.*

- ☐ Gastric Reflux
Date of onset: _____
Date physician first connected this injury to WTC work: _____
- ☐ Hypertension
Date of onset: _____
Date physician first connected this injury to WTC work: _____
- ☐ Indigestion
Date of onset: _____
Date physician first connected this injury to WTC work: _____
- ☐ Insomnia
Date of onset: _____
Date physician first connected this injury to WTC work: _____
- ☐ Leukemia
Date of onset: _____
Date physician first connected this injury to WTC work: _____
- ☐ Lung Cancer
Date of onset: _____
Date physician first connected this injury to WTC work: _____
- ☐ Lymphoma
Date of onset: _____
Date physician first connected this injury to WTC work: _____
- ☐ Nausea
Date of onset: _____
Date physician first connected this injury to WTC work: _____
- ☐ Pulmonary Fibrosis
Date of onset: _____
Date physician first connected this injury to WTC work: _____
- ☒ Shortness of Breath
Date of onset: 2/10/2005
Date physician first connected this injury to WTC work: To be supplied at a later date
- ☐ Sinusitis
Date of onset: _____
Date physician first connected this injury to WTC work: _____

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- ☒ Other: Airway Hyperreactivity
Date of onset: _____
Date physician first connected this injury to WTC work: To be supplied at a
later date

NOTE: The foregoing is NOT an exhaustive list of injuries that may be alleged.

2. As a direct and proximate result of the injuries identified in paragraph "1", above, the Ground Zero-Plaintiff has in the past suffered and/or will in the future suffer the following compensable damages:

- ☒ Pain and suffering
- ☒ Loss of the pleasures of life
- ☒ Loss of earnings and/or impairment of earning capacity
- ☒ Loss of retirement benefits/diminution of retirement benefits
- ☒ Expenses for medical care, treatment, and rehabilitation
- ☒ Other:
 - ☒ Mental anguish
 - ☒ Disability
 - ☒ Medical monitoring
 - ☒ Other: Not yet determined.

3. ☒ As a direct and proximate result of the injuries described *supra*, the derivative plaintiff(s), if any, have in the past suffered and/or will in the future suffer a loss of the love, society, companionship, services, affection, and support of the plaintiff and such other losses, injuries and damages for which compensation is legally appropriate.

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WHEREFORE, plaintiff(s) respectfully pray that the Court enter judgment in his/her/their favor and against defendant(s) for damages, costs of suit and such other, further and different relief as may be just and appropriate.

Plaintiff(s) demands that all issues of fact in this case be tried before a properly empanelled jury.

Dated: New York, New York
January 3, 2006

Yours, etc.,

Worby, Groner Edelman & Napoli Bern, LLP
Attorneys for Plaintiff(s), Paul Arias and Lisa-Ann Arias

By: 

Christopher R. LoPalo (CRL 6466)
115 Broadway
12th Floor
New York, New York 10006
Phone: (212) 267-3700

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ADDENDUM A

Plaintiff(s), Paul Arias (and Wife, Lisa-Ann Arias) repeat(s), reiterate(s), and reallege(s) paragraphs 331 through paragraph 505 of the Master Complaint with the same force and effect as if set forth more fully at length therein as against the following defendants:

- ☐ 150 BROADWAY N.Y. ASSOCS. L.P.,
- ☐ 160 WATER ST. INC
- ☐ 30 BROAD STREET ASSOCIATES, L.L.C.,
- ☒ A RUSSO WRECKING
- ☒ ABM INDUSTRIES, INC.
- ☒ ABM JANITORIAL NORTHEAST, INC.
- ☒ ACROW CORPORATION OF AMERICA
- ☒ AMEC EARTH & ENVIRONMENTAL, INC.
- ☒ ANTHONY CORTESE SPECIALIZED HAULING, LLC
- ☒ ASG PEST CONTROL
- ☒ ATC ASSOICATES, INC.
- ☒ ATLANTIC HEYDT CORP
- ☒ ATLAS CONCRETE CORP
- ☒ BACOU-DALLOZ US HEADQUARTERS
- ☒ BECHTEL CONSTRUCTION, INC.
- ☒ BECHTEL CORPORATION
- ☒ BECHTEL ENVIRONMENTAL, INC.,
- ☒ BERGEN CONCRETE CUTTING, INC
- ☒ BERKEL & COMPANY, CONTRACTORS, INC.
- ☒ BFP ONE LIBERTY PLAZA CO , L.P ,
- ☐ BFP ONE LIBERTY PLAZA CO., LLC,
- ☒ BFP TOWER C CO. LLC,
- ☒ BIG APPLE WRECKING & CONSTRUCTION CORP
- ☐ BOSTON PROPERTIES,
- ☐ BRANCH SERVICES

- ☒ BREEZE CARTING CORP
- ☒ BREEZE NATIONAL, INC.
- ☒ BRER-FOUR TRANSPORTATION CORP.
- ☐ BROOKFIELD FINANCIAL PROPERTIES, INC.,
- ☐ BROWN HARRIS STEVENS,
- ☒ BURO HAPFOLD CONSULTING ENGINEERS, P.C.
- ☒ C & D FIREPROFFING & PLASTERING CORP
- ☒ C & D PAINTING & DECORATING, INC.
- ☒ C.B. CONTRACTING CORP
- ☐ CALEDONIAN INSURANCE COMPANY
- ☒ CANRON CONSTRUCTION CORP
- ☒ CANTOR SEINUK GROUP
- ☐ CAPITAL PROPERTIES, INC.,
- ☐ CARLOS CONSTRUCTION
- ☒ CERTIFIED FENCE CORP.
- ☒ CIVETTA-COUSINS IV, L.L.C
- ☒ CLARCOR AIR FILTRATION PRODUCTS, INC.
- ☒ COMPONENT ASSEMBLY SYSTEMS, INC.
- ☒ CONSULTING ENGINEERS, P.C.
- ☐ COOPER SQUARE REALTY, INC,
- ☒ COORDINATED METALS, INC
- ☒ CORD CONTRACTING CO., INC
- ☒ CRAIG TEST BORING COMPANY INC.
- ☒ CRITICOM INTERNATIONAL CORPORATION
- ☒ CUSHMAN & WAKEFIELD, INC,
- ☒ DAKOTA DEMO-TECH
- ☒ DCM ERECTORS, INC
- ☐ DEUTSCHE BANK
- ☒ DIAMOND POINT EXCAVATING CORP
- ☒ DIEGO CONSTRUCTION, INC.

- ☒ DIVERSIFIED CARTING, INC.
- ☒ DMT ENTERPRISE, INC.
- ☒ D'ONOFRIO GENERAL CONTRACTORS CORP
- ☒ EAGLE LEASING & INDUSTRIAL SUPPLY
- ☒ EAGLE ONE ROOFING CONTRACTORS INC.
- ☒ EAGLE SCAFFOLDING CO
- ☒ EJ DAVIES, INC.
- ☐ EMPIRE STATE PROPERTIES, INC
- ☒ EN-TECH CORP
- ☒ ET ENVIRONMENTAL
- ☒ EVERGREEN RECYCLING OF CORONA
- ☒ EWELL W. FINLEY, P.C.
- ☒ EXECUTIVE MEDICAL SERVICES, P.C.
- ☒ F&G MECHANICAL, INC.
- ☒ FELIX EQUITIES, INC.
- ☒ FLEET TRUCKING, INC.
- ☒ FRANCIS A. LEE COMPANY, A CORPORATION
- ☒ FRANCIS MICHELLER CONTRACTING
- ☒ FT. TRUCKING
- ☒ GILSANZ MURRAY STEFICEK, LLP
- ☒ GINO CRACOLICE & SONS, INC
- ☐ GLO MANAGEMENT, INC ,
- ☒ GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC
- ☒ GRACE INDUSTRIES, INC.
- ☐ GRUBB & ELLIS MANAGEMENT SERVICES, INC.,
- ☒ HALLEN WELDING SERVICE, INC.
- ☒ HELMSMAN MANGEMENT SERVICES, INC.
- ☒ HGC CONTRACTING CORP
- ☒ HIGH-RISE ELECTRIC, INC.
- ☒ HIGH-RISE HOISTING AND SCAFFOLDING, INC
- ☒ HP ENVIRONMENTAL

☐ J.P. MORGAN CHASE CORPORATION,

☐ JEMB REALTY CORP

☒ JP EQUIPMENT RENTAL MATERIALS, INC.

☐ KIBEL COMPANIES,

☒ KOCH SKANSKA, INC.

☒ LAQUILA CONSTRUCTION INC

☒ LASTRADA GENERAL CONTRACTING CORP

☐ LEFRAK ORGANIZATION INC

☒ LESLIE F. ROBERTSON ASSOCIATES CONSULTING ENGINEER P.C.

☒ LIBERTY MUTUAL INSURANCE COMPANY

☒ LIBERTY MUTUAL INSURANCE COMPANY

☒ LIBERTY MUTUAL INSURANCE COMPANY

☒ LIBERTY MUTUAL INSURANCE COMPANY

☒ LIBERTY MUTUAL MANAGED CARE, INC.

☒ LIRO, INC.

☒ LOCKWOOD KESSLER & BARTLETT, INC.

☒ LUCIUS PUTKIN, INC

☒ LZA TECH-DIV OF THORTON TOMASETTI

☒ M.G. MCLAREN, P.C.

☒ MANAFORT BROTHERS, INC.

☐ MAYORE ESTATES LLC,

☒ MAZZOCCHI WRECKING, INC.

☒ MEDCORE MEDICAL AND HOSPITAL SUPPLY

☒ MENT BROS. IRON WORKS CO., INC.

☒ MERIDIAN CONSTRUCTION CORP.

☒ MG MCLAREN, P.C.

☐ MILFORD MANAGEMENT CORP,

☐ MILSTEIN PROPERTIES CORP.,

☒ MOODY'S INVESTORS SERVICE,

☒ MORETRENCH AMERICAN CORPORATION

- ☒ MRA ENGINEERING P.C.
- ☒ MUESER RUTLEDGE CONSULTING ENGINEERS
- ☐ MURRAY HILL PROPERTIES,
- ☒ MUSCO SPORTS LIGHTING, LLC
- ☒ NACIREMA INDUSTRIES INCORPORATED
- ☒ NEW YORK CRANE & EQUIPMENT CORP.
- ☒ NICHOLSON CONSTRUCTION COMPANY
- ☒ NYC INDUSTRIAL DEVELOPMENT AGENCY,
- ☒ OFF ROAD WELDING, INC
- ☒ OLYMPIC PLUMBING & HEATING CORP
- ☐ ONE WALL STREET CORPORATION,
- ☒ OVE ARUP & PARTNERS P.C.
- ☒ PARSON GROUP
- ☒ PETER SCALAMANDRE & SONS, INC.
- ☒ PINNACLE ENVIRONMENTAL CORP
- ☒ PRO SAFETY SERVICES, LLC
- ☒ PT & L CONTRACTING CORP
- ☒ REGIONAL SCAFFOLD & HOISTING CO, INC.
- ☒ RICH-MARK ENVIRONMENTAL SERVICES INC
- ☒ ROBER SILMAN ASSOCIATES
- ☒ ROBERT L. GEROSA, INC
- ☐ ROCKROSE DEVELOPMENT CORP,
- ☒ RODAR ENTERPRISES, INC.
- ☒ ROYAL GM INC.
- ☐ RY MANAGEMENT
- ☒ SAB TRUCKING INC.
- ☒ SAFEWAY ENVIRONMENTAL CORP
- ☐ SAKELE BROTHERS, L.L.C,
- ☒ SEASONS INDUSTRIAL CONTRACTING
- ☒ SEMCOR EQUIPMENT AND MANUFACTURING CORPORATION
- ☒ SHELDRAKE ORGANIZATION, INC.

- ☒ SILVERITE CONTRACTORS
- ☒ SILVERSTEIN DEVELOPMENT CORP.
- ☒ SILVERSTEIN WTC PROPERTIES LLC
- ☒ SIMPSON GUMPERTZ & HEGER INC
- ☒ SKIDMORE OWINGS & MERRILL LLP
- ☒ STAR DELTA ELECTRIC
- ☒ STIER ANDERSON LLC
- ☒ SUMMIT STRUCTURES LLC
- ☒ SURVIVAIR
- ☒ TELENET COMMUNICATIONS INC
- ☐ THE BANK OF NEW YORK,
- ☐ THE RELATED COMPANIES, L.P.
- ☒ TISHMAN SPEYER PROPERTIES,
- ☒ TOMASETTI GROUP
- ☒ TORRETTA TRUCKING, INC
- ☒ TOTAL SAFETY CONSULTING, L.L.C
- ☐ TRAMMELL CROW COMPANY,
- ☐ TRINITY CENTRE, LLC,
- ☐ TRIO ASBESTOS REMOVAL,
- ☒ TUCCI EQUIPMENT RENTAL CORP
- ☒ TYYSSENKRUPP ELEVATOR COPORATION
- ☒ ULTIMATE DEMOLITIONS/CS HAULING
- ☒ UNITED STATES REBAR, INC.
- ☐ VERIZON NEW YORK INC,
- ☒ VERTICAL LEND INC
- ☒ VOLLMER ASSOCIATES LLP
- ☒ W HARRIS & SONS INC
- ☒ WEEKS MARINE, INC.
- ☒ WELDINGER ASSOCIATES, CONSULTING ENGINEERS, P.C.
- ☐ WFP TOWER A. CO., L.P.,

- ☐ WFP TOWER B. CO., L.P.,
- ☒ WFP TOWER D. CO., LP,
- ☒ WHITNEY CONTRACTING INC.
- ☒ WOLKOW-BRAKER ROOFING CORP
- ☒ YANNUZZI & SONS INC
- ☒ YONKERS CONTRACTING COMPANY, INC.
- ☒ YORK HUNTER CONSTRUCTION, LLC
- ☐ ZAR REALTY MANAGEMENT CORP.,
- ☐ ZECKENDORF REALTY

CHRISTOPHER R. LOPALLO, an attorney at law, duly admitted to practice in the Courts of the State of New York, affirms under the penalties of perjury that:

He is the attorney for the plaintiff(s) in the above-entitled action. That he has read the foregoing SUMMONS AND VERIFIED COMPLAINT and knows the contents thereof, and upon information and belief, deponent believes the matters alleged therein to be true.

The reason this Verification is made by deponent and not by the plaintiff(s) is that the plaintiff(s) herein reside(s) in a county other than the one in which the plaintiff's attorneys maintain their office.

The source of deponent's information and the grounds of his belief are communication, papers, reports and investigation contained in the file.

DATED: New York, New York
January 3, 2006


CHRISTOPHER R. LOPALLO, Esq.

Docket No.:

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Paul Arias (and Wife, Lisa-Ann Arias),
Plaintiff(s)

- against -

1 WORLD TRADE CENTER LLC, et al.

Defendant(s).

SUMMONS AND VERIFIED COMPLAINT

WORBY GRONER EDELMAN & NAPOLI BERN, LLP

Attorneys for: Plaintiff(s)

Office and Post Office Address, Telephone

115 Broadway - 12th Floor

New York, New York 10006

(212) 267-3700

To

Attorney(s) for

Service of a copy of the within

is hereby admitted.

Dated,

Attorney(s) for

PLEASE TAKE NOTICE:

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of an

duly entered in the office of the clerk of the within named court on 20

☐ NOTICE OF SETTLEMENT

that an order

will be presented for settlement to the HON.

the

within named Court, at

on

20

at

M.

Dated,

of which the within is a true copy

one of the judges of

Yours, etc.,

WORBY GRONER EDELMAN & NAPOLI BERN, LLP